



**N.J.A.C: 6A:9, PROFESSIONAL LICENSURE AND STANDARDS
WRITTEN TESTIMONY
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Teacher Preparation

We are pleased to see that the Department is requiring that alternate route teachers complete some pre-service instruction and that K-5 teachers complete study in the pedagogy of mathematics and language arts. This will result in better instruction for the students in our schools. We also appreciate that the Department is finally clarifying the relationship between the mentor and provisional teacher.

We have some concerns about the documentation being reviewed for program approval of professional education programs by the State Program Approval Council in 6A:9-10.1(b)4. This documentation includes data on candidates' performance on program based assessments, candidates' performance at the end of the provisional period, and P-12 student achievement data. Without further clarification of how this documentation will be used, we must oppose the use of this data if it is in any way linked to individual candidates.

Educational Technology and Computer Literacy versus Information Literacy

We appreciate that the Department is clarifying the difference between the Technology Education endorsement and teaching Computer Literacy in 6A:9-5.20 and 9-9.2(a)8i. However, the proposed code in 9-5.20 states that an individual may be assigned to teach "computer and information literacy." Teaching Information literacy is the role of the School Library Media Specialist (SMLS). The SMLS receives specific training and is "highly qualified" to teach this area. As with any other subject, there is a scope and sequence to teaching information literacy. It is more than simply knowing how to search the Internet. It also entails knowing the criteria for evaluating information, selecting the correct databases, being familiar with keyword and subject heading searches, or knowing when to use a print resource rather than an electronic one, to name just a few examples. The Department could clarify this by referring to "computer literacy and information technology" to differentiate between the role of the SMLS and the computer literacy teacher.

This same language change throughout the Professional Licensure and Standards code would ensure there is no confusion about the role of the teacher in using educational technology and the role of the School Library Media Specialist in teaching information literacy.

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Speech Correctionists/Speech-Language Specialists

The department is proposing to change the speech-language specialist upgrade requirements at 6A:9-13.6. The State has a long-standing practice of grandfathering the licensure rights of any fully certified practitioner at the time of a change in requirements. When there was a federal requirement for speech correctionists to upgrade to speech-language specialists, this practice could not be followed. Since there is no longer a federal requirement for the upgrade, there is no reason for the State not to conform to practice.

Career and Technical Education

We are deeply concerned with the fact that the proposed code in 6A:9-9.2(a)9.iv authorizes Career and Technical Education (CTE) teachers to place and supervise CTE students in cooperative education experiences in the occupation in which the teacher is certified. How are teachers supposed to adequately supervise students in a cooperative education program while they are teaching? This could lead to a lack of appropriate supervision for students in their job situations. Let the Cooperative Education Coordinator continue to do the job.

We have a few comments about the CTE certification requirements in 6A:9-11.2. It is appropriate that individuals seeking experience-based CTE instructional endorsements take a basic skills test if they do not have a college diploma. However, we are concerned that this testing, along with the pre-service alternate route requirement, could prevent individuals from entering teaching due to the small timeframe available when jobs open up. This could prevent individuals with valuable experience from teaching students. In addition, we question why this proposed code removes the journeyman certificate as an option to demonstrate knowledge of a field.

Teacher of Supplementary Instruction in Reading and Mathematics, Grades K-8.

We fail to see why the creation of this new certificate is necessary. The elementary endorsement already allows K-5 teachers to teach reading, writing, arithmetic and spelling for basic skills only, in all grades. To be eligible for this proposed certificate, an individual must be eligible for a K-5 certificate. Why is the department proposing a new certificate when the mentoring language of this proposed certificate could be incorporated into the already existing K-5 endorsement?

6A:9-17.1, Certificate holder

We have concerns with 6A:9-17.1, Certificate holder. It states that "any crime or offense" must be reported. This is too broad. Is it meant to include motor vehicle offenses? Must a teacher who is arrested for failure to pay a parking ticket report it to the Superintendent? Reporting should be limited to offenses within the terms of the forfeiture statute, NJSA 2C:51-2, or the disqualification statute, NJSA 18A:6-7.1. Furthermore, if this code is adopted as written, there will be undoubtedly be affected individuals who do not know about the regulation. Their failure to report to the Superintendent, regardless of the crime, offense, or disposition of the charges against them, could be deemed just cause for revocation or suspension of their certificate. Clearly, this is not the intent of this proposal.

Thank you for your attention to these points.

GGs:FP:emr
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